

# **Exhibit D**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

KIMBERLY COLLINS,

Plaintiff,

v.

CHARLESTON PLACE, LLC, d/b/a  
BELMOND CHARLESTON PLACE,

Defendant.

C.A. No.: 2:15-cv-4465-PMD-BM

**DEFENDANT'S ANSWERS TO  
PLAINTIFF'S FIRST  
INTERROGATORIES**

**TO: A. CHRISTOPHER POTTS, ESQUIRE, ATTORNEY FOR PLAINTIFF:**

COMES NOW Defendant Charleston Place, LLC d/b/a Belmond Charleston Place ("Defendant"), by and through its counsel and pursuant to Federal Rules of Civil Procedure 26 and 33, and answers the following First Set of Interrogatories propounded by Plaintiff Kimberly Collins ("Plaintiff").

**I. INTRODUCTION & RESERVATION OF RIGHTS**

Defendant makes the following answers, responses, and objections to Plaintiff's First Set of Interrogatories. Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved and may be interposed at the time of the trial.

The responses are based on Defendant's present knowledge, information, and belief, as derived from (a) the knowledge and information of present employees of Defendant gained in their capacity as such, and (b) a review of the files maintained by Defendant that would be likely to contain the information called for by the Interrogatories. These responses are subject to amendment and supplementation as Defendant acquires additional information and completes its review and analysis and made without prejudice to Defendant's right to use subsequently

May 11, 2010; (3) 2009 EEOC Charge brought by Agnes McKinley, which settled after mediation; (4) 2009 EEOC Charge brought by Roslyn Edwards, for which the EEOC issued a No Cause determination; and (5) 2012 EEOC Charge brought by Walter Watson, for which the EEOC issued a No Cause determination.

13. Identify the reason(s) for plaintiff's termination from defendant.

**ANSWER:** Plaintiff was terminated from her employment with Defendant because of her unprofessional and unacceptable workplace behavior towards three members of management on April 13, 2015.

14. Identify the person(s) who made the decision to terminate plaintiff from defendant, including all persons that had input into the decision.

**ANSWER:** Paul Stracey made the decision to terminate Plaintiff's employment.

15. Please identify all persons hired to replace plaintiff (or persons assigned to perform plaintiff's duties) after plaintiff's termination from defendant including name, address, race, date of hire, and date of termination, if applicable.

**ANSWER:** Kendall Jones (Caucasian) replaced Plaintiff after Plaintiff's termination from employment. Ms. Jones was hired on August 29, 2012 and remains an employee. Ms. Jones may be contacted through counsel for Defendant.

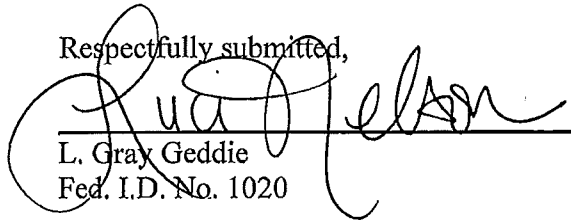
16. Please state whether any person ever filed or made a complaint alleging discrimination based upon race, either internally to defendant or externally to any outside agency or court, against or naming Shawn Crawford, Carol Etheridge, Leon Scott, or Paul Stracey. For each such instance, please identify the following:

- (a) The date the complaint was made;
- (b) The name of the person who made the complaint, the position held by such person, and, if applicable, the agency the complaint was made to;
- (c) The nature of the complaint;

further objects to this Interrogatory on the grounds that it seeks confidential and private information of individuals who are not parties to this lawsuit.

Dated this 27<sup>th</sup> day of June 2016.

Respectfully submitted,



L. Gray Geddie  
Fed. I.D. No. 1020

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST INTERROGATORIES** was this date served upon counsel of record via U.S. Mail, with proper postage affixed thereto, addressed as follows:

A. Christopher Potts  
Hitchcock & Potts  
P.O. Box 1113  
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*Attorney for Plaintiff*

Dated: June 27, 2016

  
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Debbie A. Lazo